

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRUCE KEITHLY and DONOVAN LEE,
Individually and on Behalf of all Others
Similarly Situated,

Interim Lead Plaintiffs,

v.

INTELIUS, INC., A Delaware Corporation; and
INTELIUS SALES, LLC, A Nevada Limited
Liability Company,

Defendants

v.

ADAPTIVE MARKETING, LLC, a Delaware
Limited Liability Company,

Third Party Defendant.

No. C09-1485RSL

DECLARATION OF KARIN B. SWOPE
IN SUPPORT OF PLAINTIFFS'
MOTION TO AMENDED COMPLAINT

Pursuant to 28 U.S.C. § 1746, I, Karin B. Swope, declare as follows:

1. I am Counsel representing the Plaintiffs in this matter and am licensed to practice in this State. I make this Declaration based on personal knowledge and am competent to testify to the matters set forth herein.

2. Plaintiffs asked Intelius to stipulate to filing an amended complaint to change the class period in writing on January 27, 2011, by telephone on February 8, 2011 and via telephone and writing on February 10, 2011; and requested to add breach of contract claims via telephone

DECLARATION OF KARIN B. SWOPE IN SUPPORT OF
PLAINTIFFS' MOTION TO AMENDED COMPLAINT
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LAW OFFICES OF
KELLER ROHRBACK L.L.P.
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1 on February 8, 2011 and via telephone and in writing on February 10, 2011. Intelius declined to
2 stipulate.

3 3. Attached to this Declaration as Exhibit A is a true and correct copy of Plaintiffs'
4 Second Amended Consolidated Complaint with proposed changes in redline.

5 4. Attached to this Declaration as Exhibit B is a true and correct clean copy of
6 Plaintiffs' proposed Second Amended Consolidated Complaint.

7 I declare under penalty of perjury of the laws of the United States that the foregoing is
8 true and correct.

9 DATED this 10th day of February, 2011 at Seattle, Washington.

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11 /s/ Karin B. Swope
12 Karin B. Swope, WSBA #24015
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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2011, I caused to be served a true and correct copy of **DECLARATION OF KARIN B. SWOPE IN SUPPORT OF PLAINTIFFS AMENDED COMPLAINT** on the following recipients via the method indicated:

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☒ Via ECF
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*Attorneys for Intelius, Inc and
Intelius Sales, LLC*

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Attorneys for Adaptive Marketing LLC

DATED this 10th day of February, 2011.

s/Karin B. Swope
Karin B. Swope